

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	:	
On its Own Motion	:	
	:	11-NOI-01
Notice of Inquiry into the Implementa-	:	
tion of Public Act 97-0222	:	

Initial Comments of CNT Energy

I. Introduction

CNT Energy appreciates the opportunity to comment on the Commission’s existing consumer education information for residential and small commercial customers. CNT Energy believes that there is a need to update this information to help customers understand residential real time pricing (RTP) programs and compare them to other residential consumer choice options. Our comments below will offer suggestions for the content of this update.

CNT Energy is a division of the Center for Neighborhood Technology. Since 1978, the Center for Neighborhood Technology (CNT) has been a leader in promoting urban sustainability. CNT Energy’s programs, research, and policy work help consumers and communities obtain the information and services they need to control energy costs and become more energy efficient. We pioneered Illinois’ residential real time pricing programs, and now administer and co-administer the largest such program in the country for the Ameren Illinois Utilities and Commonwealth Edison. These programs provide Illinois’ residential consumers with a choice of taking hourly electric supply rates from their incumbent electric utilities.

II. The Commission's Existing Consumer Education Information Does Not Adequately Address Residential Real Time Pricing as an Available Option to Consumers

The Commission's official electric choice website, www.pluginillinois.org, provides a central source of consumer information on electric choice and electric supply prices, organized in three sections:

- A homepage with links to 'Electric Choice Basics,' 'About Electric Choice,' 'Price to Compare,' and 'Space Heat Customers;'
- Your Electric Choices, which explains the various types of rates and suppliers and the process for switching suppliers; and
- Compare Offers Now, which shows current rates from various suppliers.

Each of these sections provides an opportunity to educate customers about all electric supply options, including RTP programs. However, in several places, the website does not provide educational materials on RTP or fails to help consumers make a meaningful comparison between RTP and the utility flat rate or ARES rates. This ability to compare RTP and flat rate offers is not only important for current flat rate customers who are considering their options, but also for RTP customers who are considering whether a competitive supplier's flat rate option may be a better choice for them.

In the suggested language below, we recommend calling the utility RTP programs by their brand names, to aid consumers in remembering whether they are currently on the program. However, we would not oppose referring to the programs generically as "residential real time

pricing programs.” CNT Energy’s suggested revisions are intended to place RTP on a level footing with other supply options in each of these sections, and allow consumers to make an equitable comparison between all of their supply options. To make an informed choice, residential customers must be educated about all available supply options, including residential real time pricing options.

Our suggestions below only require changes to the text of the existing website. However, CNT Energy believes that the Plug In Illinois website is confusing for consumers and poorly organized throughout. A casual trip through the website does not reveal a consistent or obvious internal organization. We recognize that this may be the result of the site’s organic development over time. However, we strongly encourage the Commission to take the opportunity provided by this NOI to revisit the site’s outline, page headings and titles, left margin links, and in-text links and references to create consistency and a more logical flow.

III. Proposed Language

A. Home Page Link to ‘Electric Choice Basics.’

The Electric Choice Basics page provides basic information to help consumers make an informed electric supply choice. In addition to the information currently available, this page should include an additional bullet point to alert RTP customers and provide information to help them make a meaningful comparison between flat rates and RTP rates.

Proposed Language:

→ ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by the hour. Hourly prices for the next day are set the night before

and can be communicated to customers so they can determine the best time of day to run major appliances. While savings are not guaranteed, you can manage electricity costs under real time pricing by shifting your use of electricity to hours when prices are higher. To participate in this program, customers without a smart meter must have a meter capable of recording hourly information installed.

To make a meaningful comparison between variable RRTP or Power Smart Pricing rates and flat rates, customers should compare their past supply cost savings, provided by their RRTP or Power Smart Pricing provider, with a supply cost savings estimate provided by the flat rate provider. Competitive supplier savings estimates are often calculated as a percentage savings compared to the utility's flat supply rate. By comparing this estimate with an estimate of RTP savings compared to the same utility flat supply rate, an RTP customer will be able to see whether the flat rate or the RTP rate provide the best deal, compared to the utility flat rate.

Customers should bear in mind, however, that since RRTP and Power Smart Pricing rates vary over time, past savings do not predict future savings, but only serve as a guide to compare past performance.

The Electric Choice Basics page also includes links to two additional pages, 'Understanding the Utility's Electric Supply Price' and 'Frequently Asked Questions.'

1. Understanding the Utility's Electric Supply Price

Understanding the Utility's Electric Supply Price does not reference RTP programs, and so does not adequately explain the utility supply prices paid by all customers. To remedy this, CNT Energy recommends that the page include a section for RTP customers that is consistent with language used elsewhere on the site:

Proposed Language:

Real Time Prices

ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by

the hour. Like utility flat rates, the utilities charge customers for the costs of purchasing electric supply, without any mark-up or profit, based on how much electricity a customer uses monthly. However, the charge varies based on when the electricity was used. So, the items on your RRTP and Power Smart Pricing bills will not be the same as on a flat rate bill.

Find more information on Ameren Illinois Power Smart Pricing bill in the Understanding Your Bill section here [hyperlink to <http://www.powersmartpricing.org/how-it-works/program-guide/#Compare%20Your%20Rate%20Options>]. Find more information on ComEd's RRTP bill here in the Real-Time Pricing Guide available here. [hyperlink to www.thewattspot.com]

The 'Price to Compare' section of the Understanding the Utility's Electric Supply Price page includes links further to two pages titled 'Breaking Down the Utility Charges on Your Residential Bill.' One of these pages is for ComEd customers and one is for Ameren Illinois customers.

a. Breaking Down the Utility Charges on Your Residential Bill

The pages titled Breaking Down the Utility Charges on Your Residential Bill help consumers understand their utility flat rate electric bills and make meaningful comparisons between those bills and the rates quoted by competitive retail suppliers. These pages, however, do not contain any information for RTP customers. CNT Energy recommends that these pages be altered to include information for RTP customers, titled 'Attention Power Smart Pricing Customers' for Ameren and 'Attention Residential Real Time Pricing (RRTP) Customers' for ComEd. Alternatively, these sections could be titled generically as 'Attention Residential Real Time Pricing Customers.' The titles should be in red, to match the current warning to space heating customers.

CNT Energy recommends that these new sections include the following language to help RTP customers make meaningful comparisons between their RTP bills and flat rates:

Proposed Language:

To make a meaningful comparison between variable RRTP or Power Smart Pricing rates and flat rates, customers should compare their past supply cost savings, provided by their RRTP or Power Smart Pricing provider, with a supply cost savings estimate provided by the flat rate provider. Competitive supplier savings estimates are often calculated as a percentage savings compared to the utility's flat supply rate. By comparing this estimate with an estimate of RTP savings compared to the same utility flat supply rate, an RTP customer will be able to see whether the flat rate or the RTP rate provide the best deal, compared to the utility flat rate.

Customers should bear in mind, however, that since RRTP and Power Smart Pricing rates vary over time, past savings do not predict future savings, but only serve as a guide to compare past performance.

In addition, to ease navigation, CNT Energy recommends retitling these pages to match the links that lead to them, "Price to Compare for ComEd" and "Price to Compare for Ameren." As a general principle, we recommend consistency between page titles and their links throughout the website.

2. Frequently Asked Questions

The Frequently Asked Questions page references real time pricing programs, and invites consumers to "visit the real-time pricing websites at the links above for more information."

Those links, however, are unclear. CNT Energy suggests that the hyperlinks be amended so that the words 'Ameren Illinois' Power Smart Pricing' are linked to www.powersmartpricing.org and the words 'ComEd's Residential Real Time Pricing (RRTP)' are linked to www.thewattspot.org.

In addition, the FAQ no longer accurately describes the need for a new meter for RTP customers. ComEd's AMI Pilot has installed some smart meters, capable of working with RRTP on residences, and more are expected within the next few years. Consequently, CNT Energy suggests that the Frequently Asked Questions page be altered as follows:

Proposed Language:

Are there any different rate options even if I currently do not want to select a different electric supplier?

Yes. ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by the hour and Ameren Illinois and ComEd both offer real time or hourly pricing options to help residential customers manage their usage better. Hourly prices for electricity are posted a day ahead so customers can determine the best time to run major appliances for the next day. The real time pricing option requires customers without a smart meter to have one~~a special meter to be installed at your home.~~ Visit the real-time pricing websites at the links above for more information.

B. Home Page link to 'About Electric Choice.'

CNT Energy does not suggest any changes to the 'About Electric Choice' page.

C. Home Page link to 'Price to Compare.'

The home page link to 'Price to Compare' leads consumers to the 'Understanding the Utility's Electric Supply Price' page. CNT Energy's suggested revisions to this page are discussed in section II.a. above.

D. Home Page link to 'Space Heat Customers.'

CNT Energy does not suggest any changes to the 'Space Heat Customers' page.

E. Your Electric Choices

CNT Energy does not suggest any changes to contents of the ‘What Are Your Choices?’ page, reached by clicking ‘Your Electric Choices’ on the home page. However, as one small example of an opportunity to improve the website’s internal consistency, we suggest retitling this page, and its left-margin link, as “Your Electric Choices” to match the home page link and top line tab that directs consumers to the page.

1. The Utility’s Residential Real Time Pricing Program

As one of three choices for electric supply, the ‘What Are Your Choices?’ page provides a link to a Residential Real Time Pricing page. CNT Energy recommends that the text of this page be altered as follows to make it consistent with language elsewhere on the site, to give customers a better understanding of the program, and to recognize that some customers have already received AMI meters as part of ComEd’s AMI pilot:

Proposed Language:

ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by the hour. Both Ameren Illinois and ComEd offer their residential customers a real time pricing choice that is based on the hourly market price per kilowatt hour for electric supply. Hourly prices for the next day are set the night before and can be communicated to customers so they will know the cheapest can determine the best time of day to run major appliances. While savings are not guaranteed, you can manage electricity costs under real time pricing by shifting your use of electricity to hours when prices are higher. To participate in this program, customers without a smart meter must have a special meter capable of recording hourly information will be installed.

For information on how to compare real-time pricing to a flat rate price, see the Compare Offers Now section of this website.

To learn more about the real time pricing program, click the applicable link below:

- Ameren Illinois
- ComEd

F. Compare Offers Now

CNT Energy recommends that the Compare Residential Supply Offers Now page alert RTP customers that their variable rates must be carefully compared to flat rates. We recommend using the same language suggested above in section III.a., Electric Choice Basics:

Proposed Language:

Real Time Pricing Customers

ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by the hour. To make a meaningful comparison between variable RRTP or Power Smart Pricing rates and flat rates, customers should compare their past supply cost savings, provided by their RRTP or Power Smart Pricing provider, with a supply cost savings estimate provided by the flat rate provider. Competitive supplier savings estimates are often calculated as a percentage savings compared to the utility's flat supply rate. By comparing this estimate with an estimate of RTP savings compared to the same utility flat supply rate, an RTP customer will be able to see whether the flat rate or the RTP rate provide the best deal, compared to the utility flat rate.

Customers should bear in mind, however, that since RRTP and Power Smart Pricing rates vary over time, past savings do not predict future savings, but only serve as a guide to compare past performance.

G. Glossary

At various points throughout the Plug In Illinois website, the left margin includes a link to a glossary. CNT Energy recommends that this link be shown in the left margin of every page of the website, except the home page. We also recommend that the glossary entry for real time

pricing be altered as follows to be consistent with language used elsewhere on the website and to recognize that some customers have already received AMI meters as part of ComEd's AMI pilot:

Proposed Language:

Real Time Pricing

ComEd Residential Real-Time Pricing (RRTP) and Ameren Power Smart Pricing customers pay electricity supply rates that vary by the hour. A rate plan offered by both Ameren Illinois and ComEd that is based on the hourly market price per kilowatt hour for electricity. Hourly prices for the next day are set the night before and can be communicated to the customer so that the customer knows can determine the cheapest best time of day to run major appliances. While savings are not guaranteed, you can manage electricity costs under real time pricing by shifting your use of electricity to hours when prices are higher. To participate in this program, customers without a smart meter must have a special meter capable of recording hourly information will be installed.

II. Conclusion

The Plug In Illinois website is a useful tool for consumers who wish to explore their energy choices. In its current state however, it does not allow consumers to explore and meaningfully compare all of their supply options. CNT Energy hopes that its recommendations will assist the Commission in making the website a more comprehensive tool for Illinois consumers.